

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND

In re:

Swain Landing LaPlata JC, LLC  
Debtor.

Case No. 25-184-ELG  
(United States Bankruptcy Court  
for the District of Columbia)

Claudia Engelhorn, *et al.*

Plaintiffs,  
v.

Case No. 1:25-ap-00159  
(United States Bankruptcy Court for  
the District of Maryland)

Erik D. Bolog, *et al.*

Defendants.

**DECLARATION OF DOUGLAS F. GANSLER IN SUPPORT OF THE BOLOG  
PARTIES' MEMORANDUM OF LAW IN OPPOSITION TO  
PLAINTIFFS' MOTION FOR ABSTENTION AND REMAND (ECF NO. 43)**

I, Douglas F. Gansler, state and declare as follows:

I am a Partner at Cadwalader Wickersham & Taft LLP, Counsel for Defendants Erik D. Bolog, Individually and as Trustee of the JAREB Irrevocable Trust Agreement dated October 11, 2021; Darnestown Road, Inc.; and Science Park Associates, LLC (the "Bolog Parties"), in the above-captioned Action, and am admitted to practice law in the State of Maryland. I am fully familiar with the facts and procedural history concerning the above-captioned proceeding. I respectfully submit this declaration (the "Declaration") in support of the Bolog Parties' Memorandum of Law in Opposition to Plaintiffs' Motion for Abstention and Remand.

1. Attached as **Exhibit A** is a true and correct copy of an email sent by Claudia Engelhorn to Erik Bolog on July 6, 2022, with redactions in accordance with Rule 9037 of the

Federal Rules of Bankruptcy Procedure and Rule 5.2 of the Federal Rules of Civil Procedure.

2. Attached as **Exhibit B** is a true and correct copy of the Notice of Gift, Intent to Make a Gift to Erik D. Bolog, signed by Claudia A. Engelhorn on October 11, 2021, and notarized on October 11, 2021.

3. Attached as **Exhibit C** is a true and correct copy of excerpts of the transcript of the deposition of Sarah K. Mayo, notary public.

4. Attached as **Exhibit D** is a true and correct copy of excerpts of the rough transcript of the deposition of Jennifer M. Shaw.<sup>1</sup>

5. Attached as **Exhibit E** is a true and correct copy of the Business Insider article entitled *A pharma heir gave her former lawyer \$10 million. Now her lawyers say she was 'tricked.'*

6. I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed on August 7, 2025.

By: 

Douglas Gansler (Bar Number: 21010)  
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<sup>1</sup> The Bolog Parties submit excerpts of the rough transcript of the deposition of Jennifer M. Shaw at this time because the final copy of the transcript has not yet been made available by the court reporter and transcription service.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7<sup>th</sup> day of August, 2025, a copy of the foregoing was served on counsel of record electronically via CM/ECF, and remaining parties by first class mail.

**Counsel of Record Served via CM/ECF:**

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Respectfully,

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